

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

<p>ANTONETTE JONES, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: right;">Plaintiffs,</p> <p style="text-align: center;">- v. -</p> <p>FIRST QUALITY ENTERPRISES, INC., FIRST QUALITY CONSUMER PRODUCTS, LLC, NUTEK DISPOSABLES, INC., WAL-MART STORES, INC., FAMILY DOLLAR STORES, INC., WALGREEN CO., dba WALGREENS, and FRED'S, INC.,</p> <p style="text-align: right;">Defendants</p>	<p>Case No. 14-cv-6305</p> <p>Hon. Leonard D. Wexler, U.S.D.J. Hon. Arlene R. Lindsay, U.S.M.J.</p>
--	---

**PLAINTIFFS' CONSENT MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT, PROVISIONAL CERTIFICATION
OF SETTLEMENT CLASS, APPOINTMENT OF COUNSEL AS CLASS COUNSEL,
AND APPROVAL OF NOTICE PLAN**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Consent Motion for Preliminary Approval of Settlement, Provisional Certification of Settlement Class, and Approval of Notice Plan, the accompanying Class Action Settlement Agreement and the exhibits attached thereto, and the accompanying Declaration of Paul C. Whalen and the exhibits attached thereto, Plaintiffs will move this Court before the Honorable Leonard Wexler, United States District Judge for the United States District Court for the Eastern District of New York, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, on a date that the Court will determine, for an Order: (1) preliminarily approving the Settlement Agreement; (2) provisionally certifying the Class pursuant to Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure for the purpose of the settlement; (3) approving the

Notice Plan; (4) setting a date and time for the Fairness Hearing; (5) appointing Plaintiffs' Counsel as Class Counsel; and (6) for such further relief as this Court deems just and proper.

The Parties' proposed Order is being filed concurrently herewith.

Plaintiffs advise the Court that this Motion is unopposed.

Respectfully submitted,

Dated: February 14, 2017

Law Office of Paul C. Whalen, P.C.

By: 

Paul C. Whalen
768 Plandome Road
Manhasset, NY 11030
P: (516) 627-5610
F: (212) 658-9685

Jones Ward PLC
Jasper D. Ward IV
Marion E. Taylor Building
312 South Fourth Street, Sixth Floor
Louisville, Kentucky 40202
P: (502) 882- 6000
F: (502) 587-2007

SIPRUT PC
Joseph J. Siprut
17 North State Street
Suite 1600
Chicago, IL 60602
P: (312) 236-0000
F: (312) 878-1342

Plaintiffs' Counsel